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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA-JSC

21 Plaintiff,

22 vs.  
23 **DECLARATION OF JAMES JUDAH IN  
24 SUPPORT OF PLAINTIFF WAYMO  
25 LLC'S ADMINISTRATIVE MOTION TO  
26 FILE UNDER SEAL PORTIONS OF ITS  
27 DISCOVERY LETTER BRIEF IN  
28 SUPPORT OF ITS MOTION TO  
COMPEL AND EXHIBITS THERETO**

29 Defendants.

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1 I, James Judah, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal Portions if Its Discovery Letter Brief in Support of Its Motion to Compel and Exhibits Thereto  
 8 (“Administrative Motion”). The Administrative Motion seeks an order sealing the following  
 9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Discovery Letter Brief in Support of Its Motion To Compel (“Discovery Letter Brief”)	Highlighted Portions	Waymo (green highlighting); Uber <sup>1</sup> (blue highlighting)
Exhibit 1	Highlighted Portions	Waymo (green highlighting)
Exhibit 2	Highlighted Portions	Waymo (green highlighting); Uber (blue highlighting)
Exhibits 3-5, 7, 12	Highlighted Portions	Uber
Exhibits 6, 11	Entire Document	Uber
Exhibit 10	Entire Document	Lior Ron

19       3. Waymo’s Statement (portions highlighted in green) contain or refer to trade secret and  
 20 confidential business information, which Waymo seeks to seal.

21       4. Waymo’s Discovery Letter Brief and Exhibits 1-2 (portions highlighted in green)  
 22 contains, references, and/or describes Waymo’s asserted trade secrets. The information Waymo seeks  
 23 to seal includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle  
 24 system, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
 25 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).

27       1 “Uber” means Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, collectively.

1 The public disclosure of this information would give Waymo's competitors access to in-depth  
2 descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such  
3 information were made public, I understand that Waymo's competitive standing would be  
4 significantly harmed.

5 5. Waymo's request to seal is narrowly tailored to those portions of the Discovery Letter  
6 Briefs and Exhibit 1-2 that merit sealing.

7 6. Waymo only seeks to seal the portions of the Discovery Letter Brief and Exhibit 2  
8 (highlighted in blue), as well as the portions of Exhibits 3-7 and 11-12 identified in the table above,  
9 because Waymo believes such information is considered confidential or non-public by Uber.

10 7. Waymo only seeks to seal Exhibit 10 because Waymo believes such information is  
11 considered confidential or non-public by Lior Ron.

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14 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
15 true and correct, and that this declaration was executed in San Francisco, California, on July 11, 2017.

16 By /s/ James Judah  
17 James Judah  
18 Attorneys for WAYMO LLC

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20 **SIGNATURE ATTESTATION**

21 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
22 filing of this document has been obtained from James Judah.

23  
24 /s/ Charles K. Verhoeven  
25 Charles K. Verhoeven  
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